

PARKER IBRAHIM & BERG LLP

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March 22, 2019

VIA CM/ECF

Judge Alan S. Trust
United States Bankruptcy Court
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
290 Federal Plaza
Central Islip, New York 11722

Re: Gustavia Home, LLC v. U.S. Bank National Association, et al.
Adv. Pro. No.: 17-08021

Dear Judge Trust:

This firm represents Defendant/Creditor U.S. Bank National Association as Indenture Trustee for the TOWD Point Mortgage Trust Asset-Backed Securities 2016-4, and Select Portfolio Servicing Inc. ("Defendants") in the above-referenced Adversary Proceeding.

By way of brief background, this Adversary Proceeding was filed on March 9, 2017. Subsequently, Defendants through prior counsel filed a Motion to Dismiss the Adversary Proceeding on April 27, 2017 (the "Motion"). Defendants' Motion was denied on January 8, 2019 and on January 10, 2019, a Scheduling Order was entered permitting the parties forty-five days to conduct fact discovery. A copy of the Scheduling Order is attached hereto as **Exhibit A.**

Our office was recently retained on behalf of Defendants in connection with this matter. We contacted counsel for Gustavia Home, LLC, Rafi Hasbani, Esq., who advised that he was also recently retained. In that regard, the parties jointly and respectfully request that the existing Scheduling Order be revised to allow for additional time to complete discovery. Accordingly, the parties respectfully submit the attached Amended Scheduling Order for Your Honor's consideration. A copy of the Amended Scheduling Order is attached hereto as **Exhibit B.** The parties would be happy to further discuss the proposed Order if there are any questions.

In addition, the parties have already engaged in settlement discussions.

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Thank you for Your Honor's review and consideration of this matter. Please contact me should Your Honor have any questions or require additional information.

Respectfully submitted,

/s/ Melinda Colón Cox
Melinda Colón Cox

cc: Rafi Hasbani, Esq. (via CM/ECF and email)